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18 TARGET CORPORATION

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20 **UNITED STATES DISTRICT COURT**
21 **EASTERN DISTRICT OF CALIFORNIA**

22 TREVON MALIK CROFTON,) Case No.: 1:21-cv-01581-AWI-JLT
23 an individual,)
24 Plaintiff, vs.) **STIPULATION TO DISMISS WITH
25**) PREJUDICE
26 TARGET CORPORATION, a Minnesota)
Corporation, and DOES 1 through 20,)
Inclusive,)
27 Defendants.) Complaint Filed: September 22, 2021
Removal Date: October 26, 2021

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1 **JOINT STIPULATION TO DISMISS WITH PREJUDICE**

2 The parties, by and through their counsel, hereby voluntarily stipulate that all
3 aspects of the above-captioned matter shall be dismissed with prejudice, pursuant to
4 F.R.C.P. 41(a)(1)(A)(ii), with each party to bear its own attorneys' fees and costs.
5

6 Dated: October 21, 2022

LEVIN & NALBANDYAN, LLP

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10 By: /s/A. Jacob Nalbandyan

11 A. Jacob Nalbandyan, Esq.
12 Attorneys for Plaintiff,
13 TREVON MALIK CROFTON

14 
15 Dated: October 21, 2022

LITTLER MENDELSON, PC

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18

19 By: 

20 Irene V. Fitzgerald
21 Vanessa M. Cohn
22 Attorneys for Defendant
23 TARGET CORPORATION

1 **PROOF OF SERVICE BY ELECTRONIC TRANSMISSION**

2 I am employed in County, California. I am over the age of eighteen years
3 and not a party to the within-entitled action. My business address is 5200 North Palm
4 Avenue, Suite 302, Fresno, California 93704-2225. On this 22nd day of November,
5 2022, I served a copy of the within document(s):

6 **STIPULATION TO DISMISS WITH PREJUDICE**

7 Based on a court order or an agreement of the parties to accept service by e-mail or
8 electronic transmission, I caused the documents to be sent to the persons at the e-mail
9 addresses on the attached service list on the dates and at the times stated thereon. I did
10 not receive, within a reasonable time after the transmission, any electronic message or
11 other indication that the transmission was unsuccessful. The electronic notification
12 address of the person making the service is jdrudge@littler.com:

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14 A. Jacob Nalbandyan, Esq.
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16 Ryan Handley, Esq.
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23
24 I declare under penalty of perjury under the laws of the State of California
25 that the above is true and correct.

26 Executed on this 22nd day of November, 2022, at Fresno, California.

27 _____
28 Jennifer A. Drudge
29 Jennifer A. Drudge